

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

D.V.D.; M.M.; E.F.D.; and O.C.G.,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY;
Kristi NOEM, Secretary, U.S. Department of
Homeland Security, in her official capacity; Pamela
BONDI, U.S. Attorney General, in her official
capacity; and Antone MONIZ, Superintendent,
Plymouth County Correctional Facility, in his official
capacity,

Defendants.

Case No. 25-cv-10676

DECLARATION OF LEILA KANG

I, Leila Kang, certify the following in support of my request for admission pro hac vice in the above-captioned matter:

1. I am a Supervising Attorney at the Northwest Immigrant Rights Project. I am one of the attorneys for Plaintiffs D.V.D., M.M., E.F.D., and O.C.G. in the above-captioned case.
2. I am admitted to the bar of the State of Washington. I also am admitted to practice before the U.S. District Courts for the Western and Eastern Districts of Washington, the U.S. Courts of Appeals for the Third and Ninth Circuits, and the U.S. Supreme Court.
3. I am a member in good standing of every jurisdiction in which I have been admitted to practice.
4. I am not the subject of any disciplinary proceedings pending in any jurisdiction in which I am a member of the bar.

5. I have never had a *pro hac vice* admission to this court (or other admission for a limited purpose under Local Rule 83.5.3) revoked for misconduct.

6. I have read and agree to comply with the Local Rules of the U.S. District Court for the District of Massachusetts.

I declare under penalty of perjury that the foregoing is true and correct. Executed March 20, 2025, in Kirkland, WA.

s/ Leila Kang

Leila Kang
Northwest Immigrant Rights Project
615 Second Avenue, Suite 400
Seattle, Washington 98104
(206) 816-3847
leila@nwirp.org